



ORIGINAL
FILE RECEIVED

EX PARTE OR LATE FILED
Office of the People's Counsel OCT 19 1992
District of Columbia

1133 15th Street, N.W. • Suite 500 • Washington, D.C. 20005-2710
(202) 727-3071 FAX (202) 727-1014
(TTY/TDD) (202) 727-2876

Federal Communications Commission
Office of the Secretary

Elizabeth A. Noël
People's Counsel

October 19, 1992

Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20555

Re: CC Docket 92-105

Dear Ms. Searcy:

Enclosed for filing in the above-referenced docket please find an original and nine (9) copies of the Comments of Telecommunications Relay Services Advisory Board of the District of Columbia ("TRSAB-DC").

By this letter and pursuant to Section 1.415(d) of the Commission's Rules and Regulations, TRSAB-DC respectfully requests that the Commission accept these late-filed Comments for inclusion in the record of this case. In support of its request, TRSAB-DC notes the following:

- o TRSAB-DC only recently became aware of CC Docket No. 92-105 and took action to participate in the case at the first available regular meeting of the Board;
- o Commission acceptance of these Comments will not disadvantage any party or participant to this proceeding, as TRSAB-DC has not included responsive-type comments;
- o TRSAB-DC previously has neither asked for nor been granted authority to file comments out of time in this docket;
- o Commission acceptance of these Comments will serve the public interest by including in the record the views of a variety of users of the public switched telephone network, many of whom have only recently become enfranchised in their access and use of that network.

No. of Copies rec'd 0+9
List A B C D E

Ms. Donna Searcy
October 19, 1992
Page 2

For these reasons TRSAB-DC respectfully urges the Commission to accept the attached Comments in CC Docket 92-105.

Any questions regarding this matter may be directed to the undersigned.

Respectfully submitted,



John C. Dodge, Esq.
Assistant People's Counsel

Enclosures

RECEIVED

OCT 19 1992

Federal Communications Commission
Office of the Secretary

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
) CC Docket No. 92-105
The Use of N11 Codes and Other)
Abbreviated Dialing Arrangements)

**COMMENTS OF THE
TELECOMMUNICATIONS RELAY SERVICES ADVISORY BOARD
OF THE
DISTRICT OF COLUMBIA**

INTRODUCTION

The Telecommunications Relay Services Advisory Board of the District of Columbia ("TRSAB-DC") was established on January 27, 1992 pursuant to an order of the Public Service Commission of the District of Columbia's ("PSC-DC") in Formal Case No. 850.¹ The PSC-DC included among TRSAB-DC's responsibilities "matters concerning TRS that are being considered by the FCC or the Federal/State Joint Board." Order No. 9927 at 180. A list of the membership of TRSAB-DC appears at Attachment A.

The instant docket was initiated before the Federal Communications Commission ("Commission") on May 6, 1992 pursuant to a Notice of Proposed Rulemaking. Comments were due June 5, 1992

¹In the Matter of Investigation Into the Reasonableness of the Authorized Return on Equity, Rate of Return, and Current Charges and Rates for Telecommunications Services Offered By The Chesapeake and Potomac Telephone Company, Order No. 9927 (January 27, 1992)

and Reply Comments were due June 22, 1992. TRSAB-DC only recently became aware of CC Docket No. 92-105, and appreciates the opportunity to provide brief comments regarding the assignment of certain three-digit NXX codes.

DISCUSSION

At its regularly scheduled meeting on October 14, 1992, TRSAB-DC adopted a "Sense of the Board" resolution that the Commission assign NXX codes 511 and 711 to telecommunications relay services nationwide. TRSAB-DC believes that Commission assignment of these abbreviated three-digit codes to TRS will further the purposes of the Americans With Disabilities Act of 1990² to assure "equivalent access" to telecommunications services for deaf, hard-of-hearing and speech-impaired users of the nation's public switched telephone network. Further, TRSAB-DC contends that use of these particular N11 codes for TRS access is consistent with TRS's character as basic telephone service.

Therefore, TRSAB-DC respectfully requests that the Commission modify its proposed amendments to Part 64, Title 47 of the Code of Federal Regulations as follows:

Subpart N -- Abbreviated Dialing

§ 64.1401 Codes Available

(a) Local exchange carriers shall make dialing arrangements using service codes 211 and 311 available so long as these codes have not been assigned for other uses by the Administrators of the North American Numbering Plan. Service codes 511 and 711 shall be reserved for assignment to telecommunications relay services in the

²Pub. L. 101-336, 104 Stat. 327, 366-69 (1990); see also 47 U.S.C. § 225 et seq.

various states.

* * *

§ 64.1402 Conditions

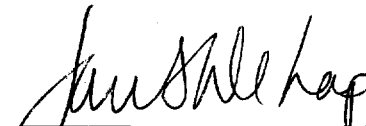
(a) Service codes 211 and 311 listed in subsection 64.1401(a) or service codes 611 and/or 811 may be assigned for other uses by the Administrators of the North American Numbering Plan.

(b) The use of any of the service codes listed in subsection 64.1402(a) for local purposes must be conditioned on the requirement that the use can be discontinued on ____ days notice by the Administrators of the North American Numbering Plan.

CONCLUSION

For the aforementioned reasons the Telecommunications Relay Service Advisory Board of the District of Columbia respectfully requests that the Commission modify its proposed amendments to Part 64 of its Rules and Regulations to reserve service codes 511 and 711 for telecommunications relay services nationwide.

Respectfully submitted,



Jan Delap, Chairperson
Telecommunications Relay Service
Advisory Board of the
District of Columbia

DATED: October 19, 1992

Attachment A

TRSAB-DC MEMBERSHIP

Margo P. Domon, Esq.
Staff Attorney
Public Service Commission
of the District of Columbia

Donald W. Boone
Manager, State Government
Affairs
AT&T

Annette Forseter
D.C. Government

Cynthia L. Jorgenson
Galludet University

Arthur Greles
Association of Late Deafened
Adults

Kenneth L. Jackson
Black Deaf Advocates

Arthur Roehrig
Metro Washington Association
of Deaf/Blind

Leo Yates
At Large

John C. Dodge, Esq.
Assistant People's Counsel
Office of the People's
Counsel of the District of
Columbia

Byron Grayson
Regulatory Affairs
C&P Telephone

James H. McVey, III
General Services
Administration

Stephanie Hamilton
John Pitts
D.C. Association of Deaf
Citizens

Dawn Dawson
Self Help for Hard of
Hearing Persons

Pamela Mason
American Speech Language
Hearing Association

Jan DeLap
Deaf Pride, Incorporated